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Attorneys for Plaintiff,  
ASHA DANIELS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ASHA DANIELS, as an Individual,  
  
Plaintiffs,  
  
v.

BIG GRRRL BIG TOURING, INC,  
a Delaware Corporation; MELISSA  
JEFFERSON (aka "LIZZO"), as an  
Individual; CARLINA  
GUGLIOTTA, as an Individual; and  
DOES 1 through 10, inclusive,  
  
Defendants.

Case No.: 2:24-cv-03571-FLA-PVC

Assigned for All Purposes to  
District Judge: Hon. Fernando L. Aenlle-Rocha  
Magistrate Judge: Hon. Pedro V. Castillo

**DECLARATION OF RONALD L.  
ZAMBANO IN SUPPORT OF  
PLAINTIFF'S APPLICATION FOR  
LEAVE TO FILE UNDER SEAL  
DOCUMENTS PRODUCED BY ORDER  
DOCKET NO. 51**

Action Filed: September 21, 2023  
Removed: April 30, 2024  
Trial Date: December 1, 2025

**DECLARATION OF RONALD L. ZAMBRANO**

I, Ronald L. Zambrano, declare:

1. I am an attorney, duly licensed to practice law before all of the courts of the State of California. I am, the Employment Chair at and Partner of West Coast Trial Lawyers, APLC, counsel of record for Plaintiff Asha Daniels (“Plaintiff”) in the action known as *Asha Daniels v. Big Grrrl Big Touring, Inc. et al.* I have firsthand knowledge of the facts set forth below and could and would testify competently as to each of the facts set forth herein of my personal knowledge.

2. On May 8, 2025, Defendant Big Grrrl Big Touring, Inc. (“Defendant”) issued subpoenas to testify and produce documents at deposition to three nonparty witnesses (“Witnesses”), Arianna Davis, Noelle Rodriguez, and Crystal Williams, set for June 4, 2025, through June 6, 2025.

3. I am counsel of record for the Witnesses against the same Defendant, in the action known as *Arianna Davis, et al. v. Big Grrrl Big Touring, Inc., et al.*, Los Angeles Superior Court, Case No. 23SMCV03553.

4. In response to these subpoenas, the Witnesses produced several strings of text messages and social media chats between them and Plaintiff. Portions of those messages relate to or repeat what I, their shared counsel, told them or what they told me in connection with their claims against the same Defendant. These portions were redacted under the assertion that they are privileged from disclosure under the attorney-client privilege through the “common interest” and/or the “joint client” doctrines.

5. **Exhibit A** is a true and correct copy of the redacted versions of the messages between the Witnesses and Plaintiff.

6. On June 16, 2025, the Parties requested an informal discovery conference to discuss the redactions. The Court ordered Plaintiff to submit the unredacted version of the messages for in camera review and ordered the Parties to submit short briefs on the issues, which the Parties complied. (Order, Docket No. 48; Defendant’s Brief,

Docket No. 49; Plaintiff's Brief, Docket No. 50).

7. On June 23, 2025, the Court, having considered the Parties' briefs, ordered Plaintiff to produce unredacted version of the messages subject to the Stipulated Protective Order in this case, within 7 days of the Order, and to be used in this litigation only. The Court also ordered Plaintiff to file an unredacted version of the messages pursuant to Local Rule 79-6. (Docket No. 51).

8. On June 30, 2025, Plaintiff complied with the Court's order by producing the unredacted version of the messages designated as Confidential subject to the Stipulated Protective Order. A true and correct copy is attached hereto as **Exhibit B**.

9. Whereas, according to Local Rule 79-6.3, the Court, after reviewing a document *in camera*, may order it to be filed publicly or under seal, the Court's Order (Docket No. 51) does not specify whether Plaintiff is ordered to file an unredacted version of the messages publicly or under seal.

10. This declaration is submitted in support of Plaintiff's Application for Leave to File Under Seal Documents Produced by Order Docket No. 51. Plaintiff seeks leave to file the unredacted version of the messages (**Exhibit B**) under seal. **Exhibit A** contains the redacted portions of the messages which are proposed to be filed under seal.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: June 30, 2025

WEST COAST EMPLOYMENT LAWYERS, APLC

BY: 

Ronald L. Zambrano, Esq.  
Attorney for Plaintiff,  
ASHA DANIELS

**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1147 South Hope Street, Los Angeles, CA 90015.

On June 30, 2025, I served the foregoing documents described as: **DECLARATION OF RONALD L. ZAMBANO IN SUPPORT OF PLAINTIFF'S APPLICATION FOR LEAVE TO FILE UNDER SEAL DOCUMENTS PRODUCED BY ORDER DOCKET NO. 51** on the interested parties in this action by placing a true copy or original thereof enclosed in a sealed envelope, addressed as follows: **SEE MAILING LIST**

- ☐ **BY MAIL (FRCP 5):** I am readily familiar with the firm's practice of collection and processing documents for mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ **BY FACSIMILE TRANSMISSION (FRCP 5):** I caused such documents to be delivered via facsimile transmittal to the office of the addressee. The transmission(s) reported as complete and without error.
- X **BY ELECTRONIC MAIL (FRCP 5(b)2(E)):** I caused such documents to be to be sent from the e-mail address madilaine@westcoasttriallawyers.com to the persons at the e-mail address(es) listed in the mailing list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
- ☐ **BY OVERNIGHT DELIVERY (FRCP 5):** I caused such documents to be delivered via express service carrier to the office of the addressee.
- ☐ **BY PERSONAL SERVICE (FRCP 5):** I caused such documents to be hand-delivered to the office of the addressee.

☐ State      X Federal

I declare under penalty of perjury pursuant to the laws of the State of California and the Federal Government of the United States of America that the foregoing is true and correct.

Executed on June 30, 2025, at Los Angeles, California.



Madilaine Yazon Venzon

**MAILING LIST**

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